

DL&G DOUGLAS, LEONARD & GARVEY, P.C.

A T T O R N E Y S

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* also admitted in MA

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April 27, 2015

Michelle Goings, Warden
Northern NH Correctional Facility
138 East Milan Road
Berlin, NH 03570

Re: RSA 91-A request

Dear Warden Goings:

Pursuant to RSA 91-A, I respectfully request that you provide me with the identities of the correctional officers who were working at the Northern NH Correctional Facility on August 24, 2012. Please provide complete copies of all documents relating and/or describing the hours that each such correctional officer worked on that day, as well as all documents relating and/or describing the job duties that each such correctional officer performed on that day.

Thank you for your attention to this request, and feel free to contact me with any questions or concerns.

Very truly yours,

Benjamin T. King

BTK/sam

July 18, 2013

Richard M. Gerry, Warden
New Hampshire State Prison for Men
PO Box 14
Concord, NH 03302

Re: Jonathan J. Leite, #86003

Dear Warden Gerry:

This office has been retained by Jonathan Leite to investigate a physical altercation that occurred on or about March 4, 2013. It is our understanding that this matter is also being investigated by the New Hampshire State Police, the Department of Corrections, and/or one or more other entities.

We request that you preserve any evidence in your possession relating to the altercation involving Mr. Leite. In particular, we request that you take affirmative steps to preserve any video and/or audio surveillance tapes that may be in your possession or in the possession of any investigator looking in to this incident.

Thank you for your prompt attention to this matter.

Very truly yours,

Benjamin T. King

BTK:dae
cc: Jonathan Leite

January 18, 2013

Larry Blaisdell, Warden
Northern NH Correctional Facility
138 East Milan Road
Berlin, NH 03570

Re: Jonathan J. Leite, #86003

Dear Warden Blaisdell:

Please be advised that this office represents the interests of Jonathan Leite with respect to injuries he sustained in a prison assault on August 24, 2012.

Please send a copy of the videotape of Mr. Leite's cell area on August 24, 2012.

Thank you for your attention to these matters. If you should have any questions, please do not hesitate to call.

Very truly yours,

Benjamin T. King

cc: Jonathan Leite
BTK/sam